

RESPONSE AND REQUEST FOR RECONSIDERATION

Please enter the amendments as shown above. Applicants have amended Claim 1 and canceled Claim 2. The limitation found in Claim 2 has been inserted into Claim 1. Claim 1, as amended, clearly identifies that "*the reactive sulfonic acid derived compound contains an olefinic double bond capable of reaction.*" Support for the amendment to Claim 1 can be found in the specification (see page 5) and in the claims. Applicants request the Examiner to reconsider the present application in view of the above amendments and following remarks.

Claim 1-22 have been rejected under 35 U.S.C. 102(e) as being anticipated by Helbing et al., (Helbing) (U.S. Patent No. 6,555,616). Applicants respectfully traverse this rejection.

The Applicants respectfully submit that the 35 U.S. C. 102 (e) rejection in the instant case is improper because Claim 1 has been amended to include the limitation that "*the reactive sulfonic acid derived compound contains an olefinic double bond capable of reaction.*" There is no disclosure, teaching, suggestion or showing in Helbing to include in the method of preparing a fiberglass composition a reactive sulfonic acid derived compound containing double bonds capable of reaction. It is respectfully submitted that Claims 1-22 are novel over the above mentioned prior art reference and the rejection should be withdrawn.

In the event the Examiner feels the above mentioned prior art is 103 (obviousness) prior art, the Applicants respectfully submit the following remarks. The Examiner maintains that Helbing teaches a method of preparing a fiberglass composition comprising an ammonium salt of an aryl sulfonic acid and a resin. By contrast, Applicants' claimed invention is directed to a method of supplying to glass a coating composition comprising a reactive sulfonic acid derived compound and a resinous coating material, wherein the reactive sulfonic acid derived compound contains an olefinic double bond capable of reaction. Helbing, on the other hand, is directed to a fiberglass composition and method of preparing such composition using a resin binder, wherein the resin binder comprises a resole resin and a catalyst comprising an ammonia salt of an aryl sulfonic acid. There is no teaching, motivation or suggestion in Helbing for someone skilled in the art to use a reactive sulfonic acid derived compound, wherein the reactive moiety is an olefinic double bond, in a fiberglass composition or the associated manufacturing process. Furthermore, Helbing teaches that the ammonia salt of an aryl sulfonic acid is used as the catalyst component of the resole resin binder composition, where the ammonium aryl sulfonate salts in the resin binder composition enhances cure rates, increases thermal stability and reduces corrosiveness to metals (see Helbing, Abstract

and col 4 lines 45-47) and not (as in the present invention) to promote adhesion or dispersion of glass in the system. There is no teaching, motivation or suggestion in Helbing that the ammonia salt of an aryl sulfonic acid promotes adhesion or dispersion of glass in the system. Additionally, Helbing teaches that the nature/structure of the sulfonic acid is not critical provided that it is soluble in an aqueous resin binder composition and provided its acid functionality is capable of catalyzing polymerization of the resole resin (see Helbing column 4 @ lines 47-51). Thus, there would be no motivation for Helbing to change from his ammonium aryl sulfonate salt to the reactive sulfonic acid derived compound of the present invention. Accordingly, the present claims are not obvious from Helbing.

In view of the above arguments, Applicants respectfully submit that the claimed invention is novel and not suggested by or obvious from the cited art and the rejection should be withdrawn.

For the foregoing reasons it is submitted that the present claims are in condition for allowance. The foregoing remarks are believed to be a full and complete response to the outstanding office action. Therefore an early and favorable reconsideration is respectfully requested. If the Examiner believes that only minor issues remain to be resolved, a telephone call to the Undersigned is suggested.

Any required fees or any deficiency or overpayment in fees should be charged or credited to Deposit Account No. 50-1501 (Noveon, Inc.).

Respectfully submitted,

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